

John Mansfield, OSB No. 055390  
john@harrisbricken.com  
HARRIS BRICKEN  
121 SW Morrison St., Suite 400  
Portland, Oregon 97204  
tel: 971.271.8615

Stephen F. Schlather (*pro hac vice*)  
John J. Edmonds (*pro hac vice*)  
sschlather@ip-lit.com  
jedmonds@ip-lit.com  
COLLINS, EDMONDS & SCHLATHER PLLC  
1616 South Voss Road, Suite 125  
Houston, Texas 77057  
(713) 364-2371

Attorneys for Plaintiff,  
MASS Engineered Design, Inc.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION**

**MASS ENGINEERED DESIGN, INC.,**  
an Ontario, Canada LLC,

Plaintiff,

v.

**PLANAR SYSTEMS, INC.,**  
an Oregon corporation,

Defendant.

Case No.: 3:16-cv-01510-SI

**STIPULATION REGARDING  
PREJUDGMENT INTEREST**

On September 11, 2018, the Court ordered that “The parties shall confer on the amount of prejudgment interest that should be included in the Court’s judgment. If the parties cannot reach agreement on this amount after conferring in good faith, they may each submit their own proposed calculation of prejudgment interest not later than two weeks from the date of this Opinion and Order.” (ECF No. 413, p. 6).

Pursuant to the Court’s instructions (noted above), further to the Parties discussion and agreement, and without waiving their objections and right to appeal any or all of damages, liability, and/or interest, Mass Engineered Design, Inc. (“Mass”) and Planar Systems, Inc. (“Planar”) hereby AGREE and STIPULATE, for purposes of case no. 3:16-cv-1510-SI only, as follows:

1. If the Court’s judgment is entered on or before November 1, 2018, the amount of prejudgment interest that should be included in the Court’s judgment is TWO HUNDRED EIGHT THOUSAND THREE HUNDRED THIRTY DOLLARS (\$208,330.00).
2. If the Court’s judgment is entered on or after November 2, 2018, the prejudgment interest amount should be increased by ONE HUNDRED EIGHTY SIX DOLLARS (\$186.00) for each day after November 1, 2018.
3. While Planar has stipulated to the amount of prejudgment interest, it has not stipulated to the correctness of the underlying calculations.

FURTHER, Planar states that this stipulation is made without waiver of its objections regarding prejudgment interest and without waiver of Planar’s right to seek a new calculation

and determination of prejudgment interest if the liability determination and/or damages determination is altered in any manner in post-judgment briefing or upon appeal.

Dated: September 25, 2018

/s/ John J. Edmonds

John Mansfield, OSB No. 055390

MansfieldLaw

121 SW Morrison Ave., Suite 400

Portland, OR 97204

971.271.8615

john@mansfieldlaw.net

Stephen F. Schlather (*pro hac vice*)

John J. Edmonds (*pro hac vice*)

COLLINS, EDMONDS & PLLC

1616 South Voss Road, Suite 125

Houston, Texas 77057

(713) 364-2371

sschlather@ip-lit.com

jedmonds@ip-lit.com

Attorneys for Plaintiff Mass Engineered  
Design, Inc.

By: /s/ Andrew T. Oliver

**Andrew T. Oliver** (admitted *pro hac vice*)

**Jacob S. Gill**, OSB No. 033238

209 SW Oak Street, Suite 500

Portland, OR 97204

Telephone: (503) 227-1600

Facsimile: (503) 227-6840

Email: jgill@stollberne.com

-And-

**Jenny W. Chen** (admitted *pro hac vice*)  
Email: Jenny.Chen@ChenIPLaw.com  
CHEN IP LAW GROUP  
7F, NO. 1, Alley 30, Lane 358  
Rueiguang Road  
Neihu District, Taipei City 114  
Taiwan (R.O.C.)  
Telephone: +(886)-2-7721-8855  
Facsimile: +(886)-2.-7721-8822

-And-

**Andrew T. Oliver** (admitted *pro hac vice*)  
Email: aoliver@ATWiplaw.com  
AMIN, TUROCY & WATSON, LLP  
160 West Santa Clara Street, Suite 975  
San Jose, California 95113  
Telephone: (650) 618-6481  
Facsimile: (216) 696-8731

**Attorneys for Defendant Planar Systems, Inc.**